## CERTIFICATE OF SERVICE

I hereby certify that I caused a true copy of the foregoing **SIDLEY AUSTIN BROWN & WOOD LLP'S MEMORANDUM IN OPPOSITION TO PLAINTIFFS' MOTION TO REMAND** dated September 12, 2005, and the **DECLARATION OF KEVIN J. O'CONNOR** dated September 12, 2005, to be served upon Plaintiffs' local counsel, S. Reid Kahn, Esq. by electronic filing on the court's CM/ECF system and to be served by overnight delivery service Federal Express upon the following attorneys of record to the within action (Civil Action No. 05-3485 (HAA)) on this 12th day of September, 2005.

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DATED: September 12, 2005